

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

In Re:

MYRNA BAERGA FELICIANO

Debtor(s)

Case No.: 10-02129 S

Chapter 13

**MOTION TO INFORM**  
**POST CONFIRMATION MODIFICATION PLAN UNDER §1329**

TO THE HONORABLE COURT:

**NOW COMES** the debtor, through the undersigned attorney, and very respectfully alleges and prays:

1. That today the debtor is filing an amended chapter 13 repayment plan.
2. That the reason for amendment is to cure arrears with trustee and comply with the trustee unfavorable report dated June 23, 2010.

**WHEREFORE**, the Trustee respectfully requests this Honorable Court to take notice of the aforementioned.

**RESPECTFULLY SUBMITTED.**

**I HEREBY CERTIFY** that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to the Chapter 13 Trustee, and we sent copy of this document through regular mail to debtor (s) and all non CM/ECF participants interested parties to their addresses listed on the master address list.

**In San Juan, Puerto Rico this 13th day of July of 2010.**

JPC LAW OFFICE

José M Prieto Carballo, Esq.  
P.O. Box 363565  
San Juan, P.R. 00936-3565  
Tel (787) 607-2066 & Tel (787) 607-2166  
jpc@jpcclawpr.com

By: /s/ Jose M Prieto Carballo, Esq.

Document Page 2 of 3  
**United States Bankruptcy Court**  
**District of Puerto Rico**

IN RE:

Case No. 10-02129-13BAERGA FELICIANO, MYRNA I

Debtor(s)

Chapter 13**CHAPTER 13 PAYMENT PLAN**

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>7/13/2010</u> <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION      Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<b>I. PAYMENT PLAN SCHEDULE</b>  \$ <u>1,500.00</u> x <u>1</u> = \$ <u>1,500.00</u> \$ <u>0.00</u> x <u>3</u> = \$ <u>0.00</u> \$ <u>1,009.00</u> x <u>22</u> = \$ <u>22,198.00</u> \$ <u>1,500.00</u> x <u>34</u> = \$ <u>51,000.00</u> \$ _____ x _____ = \$ _____  <b>TOTAL: \$ <u>74,698.00</u></b>  Additional Payments: \$ <u>3,027.00</u> to be paid as a LUMP SUM within <u>12 months</u> with proceeds to come from:  <input type="checkbox"/> Sale of Property identified as follows:  <input checked="" type="checkbox"/> Other: Account Receivables owned by clients to debtor to cure arrears to the plan  Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____	<b>II. DISBURSEMENT SCHEDULE</b>  A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: <u>COOP AC GUAYNABO</u> 5. <input type="checkbox"/> Other: _____ 6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: _____  C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.  OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) ATTORNEY FEES TO BE PAID FIRST.  ANY TAX REFUND RECIEVED DURING THE TERM OF THE PLAN SHALL BE SURRENDERED TO TRUSTEE TO FUND THE PLAN.  PLAN INCREASES WHEN DEBTOR COMPLETES PAYMENT TO ORIENTAL BANK VEHICLE LEASE FORD F150.  DEBTOR WILL CURE PRE PETITION ARREARS WITH ORIENTAL BANK (EUROLEASE) THROUGH THE PLAN AND WILL CONTINUE DIRECT PAYMENTS TO CREDITOR.  DEBTORS CONSENTS LIFT OF STAY IN FAVOR OF BMW FINANCIAL.
<b>PROPOSED BASE: \$ <u>77,725.00</u></b>	
<b>III. ATTORNEY'S FEES</b> (Treated as § 507 Priorities)  Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,124.00</u>	
Signed: <u>/s/ MYRNA I BAERGA FELICIANO</u> Debtor  _____ Joint Debtor	

Attorney for Debtor Jose PrietoPhone: (787) 607-2066

IN RE BAERGA FELICIANO, MYRNA I

Case No. 10-02129-13

Debtor(s)

**CHAPTER 13 PAYMENT PLAN**  
Continuation Sheet - Page 1 of 1

Executory Contracts - Assumed:

Cr	#	\$
EUROLEASE		